

## MARINO, TORTORELLA &amp; BOYLE, P.C.

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September 19, 2024

**Via ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *In re Insulin Pricing Litigation*, No. 23-md-3080 (MDL 3080)  
Unopposed Request for Extension of Time to File Motion to Seal**

Dear Judge Martinotti,

On August 26, 2024, this Court granted the PBM Defendants' request for a 14-day extension—until September 19, 2024—to file a motion to seal concerning Defendants' Motions to Dismiss the Self-Funded Payor Track Complaints (Albany, King, and Lake Counties) (ECF Nos. 250-259). *See* ECF No. 264.

In accordance with L.Civ.R. 6.1, the PBM Defendants respectfully request an 8-day extension—until **September 27, 2024**—to file the motion to seal. The parties are continuing to confer on the proposed material to be sealed, including on whether the scope of that material can be narrowed and any objections can be resolved, and would benefit from the brief additional time. Plaintiffs do not oppose this request. If the proposed extension meets with Your Honor's approval, we respectfully request that the Court indicate its agreement by so ordering this letter.

Thank you for your continuing time and attention to this matter.

Respectfully submitted,



John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)  
All Counsel of Record (via ECF)

So Ordered:

*s/ Brian R. Martinotti*  
Brian R. Martinotti, U.S.D.J.  
Dated: 09/19/2024

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I caused a true and correct copy of the foregoing document to be filed electronically with the Clerk of the Court and served upon all counsel of record by electronic mail.

Dated: September 19, 2024

  
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JOHN D. TORTORELLA